

FILED

NOV 02 2023

UNITED STATES DISTRICT COURT

for the

Eastern District of North Carolina

PETER A. MOORE, JR., CLERK  
US DISTRICT COURT, EDNC  
BY BKH DEP CLK

United States of America

v.

Kevin Edral Douglas

Case No.

5:23-mj-2298-BM

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 31, 2023 in the county of Wake in the  
Eastern District of North Carolina, the defendant(s) violated:

Code Section

18 U.S.C. § 875(c)

Offense Description

The defendant knowingly and willfully did transmit in interstate and foreign commerce from North Carolina to Virginia, communications to the National Center for Missing and Exploited Children via the cybertip reporting service, and the communications contained a threat to kidnap and injure certain children.

This criminal complaint is based on these facts:

please see attached affidavit

☒ Continued on the attached sheet.

On this day, Andrew Maurer appeared before me via reliable electronic means, was placed under oath, and attested to the contents of this Complaint via telephone.

Date: November 2, 2023; 11:41am

City and state: Raleigh, North Carolina

[Signature]  
Complainant's signature  
Andrew Maurer, Special Agent, FBI  
Printed name and title

[Signature]  
Judge's signature  
BRIAN S. MEYERS, U.S. Magistrate Judge  
Printed name and title

Edil made at  
direction of  
Complainant.  
BM  
11/02/2023

I, Andrew Maurer (hereafter referred to as “Your Affiant”) being first duly sworn, hereby depose and state as follows:

### **INTRODUCTION AND AGENT BACKGROUND**

1. Your affiant has been a duly sworn law enforcement officer for over twenty-four years. During this time, your affiant has accumulated approximately 2500 hours of specialized investigative training and was awarded an Advanced Law Enforcement Certificate by the North Carolina Criminal Justice Education and Training Standards Commission in May 2012. Over the last two decades of employment, your affiant has had the opportunity to investigate various types of crimes including but not limited to: narcotic and firearms related offenses, sex offenses, terrorism related offenses, offenses involving child abuse and child pornography, immigration violations and many others. Additionally, during the normal course of investigative work, your affiant has become highly familiar with firearms, social media platforms, encrypted messaging applications, and the digital exploitation and review of various types of electronic communication equipment including cellular “smartphones” and other personal computer equipment capable of network connectivity.

2. Since August of 2014, your affiant has been assigned to the Federal Bureau of Investigation’s (FBI) Joint Terrorism Task Force (JTTF) as a Task Force Officer (TFO). Your affiant received deputation as a Special Deputy United States Marshal in August of 2014 for participation in the FBI’s JTTF. As such, your affiant is dually sworn to investigate both federal violations and violations of North Carolina general statutes. Your affiant is primarily assigned to investigate matters involving terrorism and has conducted complex and lengthy investigations into various terrorism related offenses. These efforts have resulted in the arrest and subsequent

conviction and/or deportation of numerous individuals. In addition to these duties, your affiant is also regularly called upon to provide assistance to other federal law enforcement investigators who investigate other categories of offenses. Finally, your affiant is a federal law enforcement officer who is engaged in enforcing the criminal laws, including those enumerated in Title 18 of United States Code, and is therefore authorized by law to request search warrants and conduct arrests.

3. The facts in this affidavit come from your affiant's personal observations, my training and experience, and from information obtained from other agents, law enforcement officers, and/or witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

#### **PROBABLE CAUSE**

4. On or about October 31, 2023, at or around 01:32 hours UTC, the National Center for Missing and Exploited Children (NCMEC) received a series of threatening communications via a cybertip reporting service on NCMEC's public website. The reporting party stated: "...IM GOING TO SHOOT ANYATTORNEY WHERE IS A COP OMG OMG IS FLOURSECNECE YOU'RE SO PRETTY IM GOING TO SHOOT"... "VIKTORIA IS ACROSS THE STREET WITH 30 MEXICAN CHILDREN FROM SOUTH AMERICA WHICH IS north OF CENTRAL AMERICA WHICH IS NOT HERE IN RALEIGH NC"... "TOMORRRRRRRRRROW BEFORE THEY FEEEEEEEEEEEEEEEEEEAST."<sup>1</sup>

5. In another related cybertip, the reporter stated: "this is the FAMILY of the people im gonig to kill tonight in 2 hours in this hotel but i had computers and I contact soviet vlad vlad

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<sup>1</sup> Cyber Tip # 177595404

more than anyone on earth in 40 years on email from 1950 and keyboard from 1887 typewriter only NYPD 20000 cops 4000 civilians use"<sup>2</sup>

6. In another related cybertip, the reporter stated: "IM ABOSLUTELY INSANE AND DOING COCAINE VAPOR RUG FROM A VAPOR DRUG STOREIN MEJICO GUATAMELAAA IM GOING TO KILL ALL OF THEM POLIZEI POLICIE I AM HERE I AM POLLZEIZ POLICI I KILL YOU I AM GOING TO MRUDER EVERY CHILD IN THE HOTEL NOWOWWWWWWWWWW"<sup>3</sup>

7. In another related cybertip, the reporter stated: "in a ritual-killing (database please sql) im going tok ill all the mexican city children in the area that area aztec THERES 45 children near me and they were bashing on my door claiming to kill me for playing ukraibnian music notw theres soviets in the hotel im going to custom order a kill on 40 fucking mexican children starting with their mother telling me."<sup>4</sup>

8. In another related cybertip, the reporter stated: "tu gusta vida im going to kill all the children !!!!!!! the dumpster WTF people are rasta they think ist a white hotel ik k9illing mexican city guatamalans"<sup>5</sup>

9. In another related cybertip, the reporter stated: "I AM KILLING ALL THE FUQHRAR CHILDREN IN MY HOTEL I AM KILLING ALL THE FUQHRAR CHILDREN IN MY HOTEL"<sup>6</sup>

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<sup>2</sup> Cyber Tip # 177595806

<sup>3</sup> Cyber Tip # 177595807

<sup>4</sup> Cyber Tip # 177595808

<sup>5</sup> Cyber Tip # 177595809

<sup>6</sup> Cyber Tip # 177596284

10. In another related cybertip, the reporter stated: *penelope penelope i am cantoulepe i will kill you i will kill you*".<sup>7</sup> Each of these cybertips described above were on or about the same day.

11. Finally, NCMEC notes another reporter submission which stated: "DE FAMILIAE IS LA CUCKAROCHA THAT IS NOT 200 YEARS OLD YOU ARE CPUT KAPUT'TZ KPAHH KAH I AM GOIN TO MURDER ALL oh sorry i have a file right its 900 folders this goes into new information in a different 95,000 websites right but see im in a hotel and i said im going to kill like 200 children."<sup>8</sup> While this tip is not directly digitally connected to the other ones received, NCMEC notes that the language, font, and overall wording are highly consistent with the other ones and this one was received moments prior to the main one (Cyber Tip # 177595404).

12. On or about October 30, 2023, at or around 21:20 hours (EDT) the following email was transmitted to NCMEC at "hotline@ncmec.org": CON VIVOS DEU MEURTOS CON VIVOS DEU MEURTOS CON VIVOS DEU MEURTOS CON VIVOS DEU MEURTOS CON VIVOS DEU MEURTOS CON VIVOS DEU MEURTOS CON VIVOS DEU MEURTOS CON VIVOS DEU MEURTOS ITS SOLD IN VIKTORIA IN THE STORE BUT THE VIKTORIA PRINCIPEL WHERE IS AN ATTORNEY IM GOING TO SHOOT ANYATTORNEY WHERE IS A COP OMG OMG IS FLOURSECNECE YOU'RE SO PRETTY IMGOING TO SHOOT VIVA CON LOS LUE MEURTE IN VIKTORIA AND VIKTORIA IS ACROSS THE STREET WITH 30 MEXICAN CHILDREN FROM SOUTH AMERICA WHICH IS north OF CENTRAL AMERICA WHIICH IS NOT HERE IN RALEIGH NC WHICH IS NOT ON ANY MAPS CON VIVOS DEU MEURTOS CON VIVOS DEU MEURTOS CON VIVOS DEU MEURTOS CON

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<sup>7</sup> Cyber Tip # 177596292

<sup>8</sup> Cyber Tip # 177595363

VIVOS DEU MEURTOS CON VIVOS DEU MEURTOS CON VIVOS DEU MEURTOS CON  
VIVOS DEU MEURTOS CON VIVOS DEU MEURTOS CON VIVOS DEU MEURTOS CON  
VIVOS DEU MEURTOS TOMORRRRRRRRRROW BEFORE THEY  
FEEEEEEEEEEEEEEEEEE”<sup>9</sup>

13. As a normal part of cyber tip management and processing protocols, NCMEC collects various datapoints on individuals submitting online tips. These datapoints can include things like names, addresses, email address, phone numbers, and internet protocol (IP) addresses. For the aforementioned tips, the following datapoints were collected from or voluntarily provided by the submitter:

Name: Kevin Edral Douglas  
Email: declined@extendedstayamerica.com  
IP Address: 172.25.4.100

14. As a matter of routine processing, the aforementioned identifiers were cross-checked through various databases. Those checks indicated that those identifiers are affiliated with multiple other cyber tips, although the content of those tips is currently not known.

15. One such database check indicated that an individual named Kevin Edral Douglas, W/M, DOB: 6/6/1977 (hereafter referred to as “KD”) currently resided in the Raleigh, NC area. KD’s geographic area of residency is consistent with NCMEC’s assessment of where the threats were emanating from. Additionally, further checks indicated that KD was a long-term resident of the Extended Stay America Motel located at 600 Weston Parkway, in Cary, NC.

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<sup>9</sup> Cyber Tip # 177595404

16. Your affiant notes that “Bright Horizons” day care center is located at 800 Weston Parkway in Cary, NC and is directly across the street from the Extended Stay America Motel. As such, your affiant assesses that the previously described threat from Paragraph #4, which stated: “...IM GOING TO SHOOT"..."VIKTORIA IS ACROSS THE STREET WITH 30 MEXICAN CHILDREN... and the stated threat from Paragraph #7, which stated: “in a ritual-killing (database please sql) im going tok ill all the mexican city children in the area that arca aztec TIHERES 45 children near me and they were bashing on my door claiming to kill me for playing ukrainian music notw theres sovicts in the hotel im going to custom order a kill on 40 fucking mexican children starting with their mother telling me,” might have reasonably been referring to a physical attack against the Bright Horizon’s day care center, which is physically located approximately 250 feet from KD’s hotel room.

17. A review of KD’s criminal history indicates an extensive history of threatening behavior which begins in or around 2002 and spans across no less than eight states. Of particular note is a December 12, 2016, federal conviction for 18 U.S.C. §§ 875(c) (Communication of Interstate Threats). This offense was originally investigated by the Knoxville, TN division of the United States Secret Service (USSS) and the subsequent conviction resulted in an active sentence of 622 days along with 36 months of supervised release.

18. On or about November 1, 2023, detectives from the Cary Police Department obtained an arrest warrant for KD for the misdemeanor violation of NCGS 14-277.1 (Communicating Threats). A subsequent court-authorized search of his hotel room also commenced and resulted in the seizure of numerous items, including computer equipment capable of internet access and communications. KD was transported to the Cary Police Department for additional processing.



19. Your affiant conducted a post-Miranda interview of KD during which time, KD admitted to making the threats with his computer via the NCMEC website. KD also demonstrated his awareness that his actions were wrong when he attempted to minimize the offense by stating that his comments were taken out of context due to, among other things, the spacing format of the NCMEC threat report which KD claims was different from the spacing format of his original message. KD further acknowledged his previous arrest and convictions for similar type of behavior as well as his awareness that NCMEC is an entity based in or around Alexandria, VA. Lastly, KD indicated that investigators would find throwing knives and "Soviet pepper spray." Investigators identified pepper spray in his room, and the search of his room continues.

20. The National Center for Missing & Exploited Children (NCMEC) is a private, non-profit 501(c)(3) corporation whose mission is to help find missing children, reduce child sexual exploitation, and prevent child victimization. NCMEC is currently based in or around Alexandria, VA. NCMEC's cybertip reporting service allows members of the public to communicate with NCMEC via the internet. The cybertip reporting service is described on the NCMEC website as the place to report child sexual exploitation but allows any information to be submitted.

21. Based on Internet Protocol (IP) activity and statements made by KD himself, your affiant assesses that KD was in or around Cary, NC at the time he transmitted the threat over the internet to NCMEC in or around Alexandria, VA.

*(Remainder of page intentionally left blank.)*



22. Based on the foregoing, your affiant submits that there is probable cause to believe that KD violated 18 U.S.C. §§ 875(c), which makes it a crime to "...transmit in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another." KD committed this violation by transmitting a series of threatening messages to an entity located in Virginia while residing in North Carolina at the moment the threat was made.

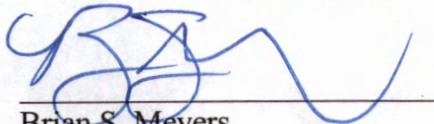


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Andrew Maurer  
Task Force Officer  
Federal Bureau of Investigation

Pursuant to Rule 4.1 of the Federal Rules of Criminal Procedure, the affiant appeared before me *via reliable electronic means*, was placed under oath, and attested to the contents of this written affidavit. *via telephone at 11:41 am.*

Dated: *November 2, 2023*



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Brian S. Meyers  
United States Magistrate Judge